

KTC:RWH/MJF  
F. #2007R00569

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

Cr. No. \_\_\_\_\_  
(T. 21, U.S.C., §§  
841(a)(1),  
841(b)(1)(A)(iii),  
841(b)(1)(B)(iii),  
841(b)(1)(C) and 846;  
T. 18, U.S.C., §§ 2 and  
3551 et seq.)

DAYSHEN RICHARDSON,  
also known as "Dutch,"  
"Man Man," "Andrew Moore,"  
"Delton Richardson,"  
"Mackody Brady" and  
"Dayshawn Richardson,"  
CHARLES MOORE,  
also known as "Samuel Brown,"  
DEMIYA ROUNTREE,  
also known as "Blessed,"  
JOSEPH LAWTON,  
TANQUA THOMAS,  
also known as "Tasha" and  
"Micca," and  
AARON ROUNTREE,

Defendants.

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE  
(Cocaine Base Conspiracy)

1. In or about and between February 2006 and February 2007, both dates being approximate and inclusive, within the Eastern District of New York, the defendants DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," CHARLES MOORE, also known as "Samuel Brown," DEMIYA ROUNTREE, also known as "Blessed," JOSEPH LAWTON, TANQUA THOMAS, also known as

"Tasha" and "Micca," and AARON ROUNTREE, together with others, did knowingly and intentionally conspire to distribute and to possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a substance containing cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

2. On or about February 1, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

3. On or about February 7, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FOUR

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

4. On or about February 28, 2006, within the Eastern District of New York, the defendants DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," and TANIQUA THOMAS, also known as "Tasha" and "Micca," together with others, did knowingly and intentionally distribute and possess with intent to

distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FIVE

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

5. On or about March 4, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIX

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

6. On or about March 8, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," together with others,

did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SEVEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

7. On or about March 15, 2006, within the Eastern District of New York, the defendant AARON ROUNTREE, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT EIGHT

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

8. On or about March 23, 2006, within the Eastern District of New York, the defendants DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," and TANIQUA THOMAS,

also known as "Tasha" and "Micca," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT NINE

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

9. On or about April 1, 2006, within the Eastern District of New York, the defendants CHARLES MOORE, also known as "Samuel Brown," and TANIQUA THOMAS, also known as "Tasha" and "Micca," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

10. On or about April 1, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also

known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT ELEVEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

11. On or about April 4, 2006, within the Eastern District of New York, the defendants DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," and CHARLES MOORE, also known as "Samuel Brown," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWELVE

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

12. On or about April 11, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTEEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

13. On or about April 20, 2006, within the Eastern District of New York, the defendant TANIQUA THOMAS, also known as "Tasha" and "Micca," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)



COUNT FOURTEEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

14. On or about April 25, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTEEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

15. On or about May 3, 2006, within the Eastern District of New York, the defendants DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," and AARON ROUNTREE, together with others, did knowingly and intentionally distribute

and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SIXTEEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

16. On or about May 10, 2006, within the Eastern District of New York, the defendants DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," and TANIQUA THOMAS, also known as "Tasha" and "Micca," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SEVENTEEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

17. On or about May 18, 2006, within the Eastern District of New York, the defendants TANIQUA THOMAS, also known

as "Tasha" and "Micca," and DEMIYA ROUNTREE, also known as "Blessed," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT EIGHTEEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

18. On or about May 24, 2006, within the Eastern District of New York, the defendant DEMIYA ROUNTREE, also known as "Blessed," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT NINETEEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

19. On or about June 1, 2006, within the Eastern District of New York, the defendant DEMIYA ROUNTREE, also known as "Blessed," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

20. On or about June 2, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-ONE

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

21. On or about June 8, 2006, within the Eastern District of New York, the defendant DEMIYA ROUNTREE, also known as "Blessed," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-TWO

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

22. On or about June 27, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-THREE

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

23. On or about June 28, 2006, within the Eastern District of New York, the defendant DEMIYA ROUNTREE, also known as "Blessed," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-FOUR

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

24. On or about July 6, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-FIVE

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

25. On or about July 27, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-SIX

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

26. On or about August 8, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-SEVEN

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

27. On or about August 10, 2006, within the Eastern District of New York, the defendants DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," and TANIQUA THOMAS, also known as "Tasha" and "Micca," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY-EIGHT

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

28. On or about September 5, 2006, within the Eastern District of New York, the defendant JOSEPH LAWTON, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense



involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY-NINE

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

29. On or about October 4, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

30. On or about October 26, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and

intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-ONE

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

31. On or about November 28, 2006, within the Eastern District of New York, the defendant DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-TWO

(Distribution and Possession with Intent  
to Distribute Cocaine Base)

32. On or about February 9, 2007, within the Eastern District of New York, the defendants DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," and TANIQUA THOMAS,

also known as "Tasha" and "Micca," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THIRTY-THREE

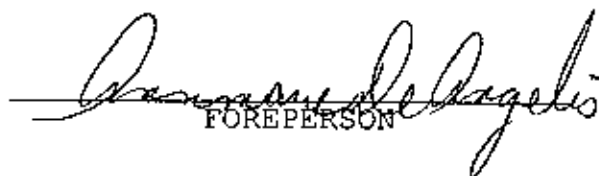
(Distribution and Possession with Intent  
to Distribute Cocaine Base)

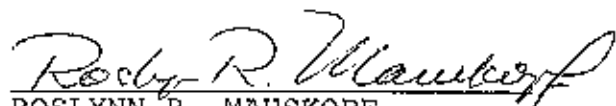
33. On or about February 20, 2007, within the Eastern District of New York, the defendants DAYSHEN RICHARDSON, also known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "Mackody Brady" and "Dayshawn Richardson," TANIQUA THOMAS, also known as "Tasha" and "Micca," CHARLES MOORE, also known as "Samuel Brown," and JOSEPH LAWYTON, together with others, did knowingly and intentionally distribute and possess with intent to

distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

A TRUE BILL

  
FOREPERSON

  
ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



## INFORMATION SHEET

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

1. Title of Case: US v. DAYSHEN RICHARDSON, known as "Dutch," "Man Man," "Andrew Moore," "Delton Richardson," "MacKody Brady" and "Dayshawn Richardson," CHARLES MOORE, also known as "Samuel Brown," DEMIYA ROUNTREE, also known as "Blessed," JOSEPH LAWTON, TANQUA THOMAS, also known as "Tasha" and "Micca," and AARON ROUNTREE,
2. Related Magistrate Docket Number(s)  
None (X)
3. Arrest Date: N/A
4. Nature of offense(s): ☒ Felony  
☐ Misdemeanor
5. Related Civil or Criminal Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules):  
06 CR - 164 ERK
6. Projected Length of Trial: Less than 6 weeks (X)  
More than 6 weeks ( )
7. County in which crime was allegedly committed: KING  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Has this information been ordered sealed? (X) Yes ( ) No
9. Have arrest warrants been ordered? (X) Yes ( ) No
10. Is a capital count included in the indictment? ( ) Yes (X) No

ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEYBy: MORRIS FODEMAN, AUSA  
Assistant U.S. Attorney  
(718) 254-6614